

SEP 25 2013

U. S. DISTRICT COURT
MID. DIST. TENN.

IN THE UNITED STATES DISTRICT COURT
FOR THE Middle DISTRICT OF TENNESSEE
21st DIVISION

Athanasios Edmontson Name

Prison Id. No. 201300029157

N/A Name

Prison Id. No. N/A

Plaintiff(s)

(List the names of all the plaintiffs
filing this lawsuit. Do not use "et
al." Attach additional sheets if
necessary.)

Civil Action No. _____
(To be assigned by the Clerk's
office. Do not write in this space.)

Jury Trial ☒ Yes ☐ No

v.

James L. Elkins Name

State of Tennessee 21st Judicial Public
Defender's Office
Defendant(s)

(List the names of all defendants
against whom you are filing this
lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
FILED PURSUANT TO 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

☐ Yes

☒ No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs

Defendants

N/A

2. In what court did you file the previous lawsuit? N/A
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)
3. What was the case number of the previous lawsuit? N/A
4. What was the Judge's name to whom the case was assigned? N/A
5. When did you file the previous lawsuit? N/A (Provide the year, if you do not know the exact date.)
6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? N/A
7. When was the previous lawsuit decided by the court? N/A (Provide the year, if you do not know the exact date.)
8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.
- ☐ Yes ☒ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

- A. What is the name and address of the prison or jail in which you are currently incarcerated? Williamson County Sheriff's Department
408 Century Court, Franklin TN 37064
- B. Are the facts of your lawsuit related to your present confinement?
- ☒ Yes ☐ No
- C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.
- N/A
- D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?
- ☐ Yes ☒ No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☐ Yes

☒ No

F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? N/A

2. What was the response of prison authorities? N/A

G. If you checked the box marked "No" in question II.E above, explain why not. It was a court matter that needed to be addressed to the judge.

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

☐ Yes

☒ No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

☐ Yes

☒ No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? N/A

2. What was the response of the authorities who run the detention facility? N/A

L. If you checked the box marked "No" in question II.I above, explain why not. It was presented to the court

Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.

III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Athanasios Edmontson

Prison Id. No. of the first plaintiff: 201300029157

Address of the first plaintiff: 408 Century Court,
Franklin TN 37064
(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: N/A

Prison Id. No. of the second plaintiff: N/A

Address of the second plaintiff: N/A

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: James L. Elkins

Place of employment of the first defendant: State of Tennessee
21st Judicial Public Defender's Office

The first defendant's address: 305 Public Square Suite 112
Franklin TN 37064

Named in official capacity?

☐ Yes

☒ No

Named in individual capacity?

☒ Yes

☐ No

2. Name of the second defendant: State of Tennessee 21st Judicial Public Defender's
Office

Place of employment of the second defendant: State of Tennessee

The second defendant's address: 305 Public Square Suite 112,
Franklin TN 37064

Named in official capacity?

☒ Yes

☐ No

Named in individual capacity?

☐ Yes

☒ No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where there they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 ½ in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four 4 sides.

wrote it on a separate piece of writing paper

V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant.

A. wrote it on writing paper

B. _____

C. _____

D. _____

E. _____

F. I request a jury trial.

☒ Yes

☐ No

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: ALL Edts Date: 9-19-13

Prison Id. No. 201300029157

Address: 408 Century Court, Franklin TN 37064

(Include the city, state and zip code.)

Signature: _____ Date: _____

Prison Id. No. N/A

Address: _____

(Include the city, state and zip code.)

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS TOGETHER. Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.

In The United States District Court For The
Middle District of Tennessee 21st Division

Athanasios Edmontson.name
(Plaintiff)

VS.

Nb. _____

State of Tennessee.name
21st Judicial District Circuit Court.name
21st Judicial District DA Office.name
21st Judicial District Public Defender's Office.name
Williamson County Sheriff's Department.name
James G. Martin III.name
Kim R. Helper.name
Jessica N. Borne.name
Vanessa P. Bryan.name
James L. Elkins.name
(Defendants)

Defendant(s)

1) State of Tennessee

The State

Unknown

Official capacity

2) 21st Judicial District Circuit Court

State of Tennessee

135 Fourth Avenue South, Franklin TN 37064

Official capacity

3) 21st Judicial Public Defender's Office

State of Tennessee

305 Public Square Suite 112, Franklin TN 37064

Official capacity

4) Williamson County Sheriff's Department

Williamson County

408 Century Court, Franklin TN 37064

Official capacity

5) Judge James G. Martin III
Williamson County Circuit Court
135 Fourth Avenue South, Franklin TN 37064
Individual capacity

6) Vanessa P. Bryan
21st Judicial Public Defender's Office
305 Public Square Suite 112, Franklin TN 37064
Individual capacity

7) James L. Elkins
21st Judicial Public Defender's Office
305 Public Square Suite 112, Franklin TN 37064
Individual capacity

8) 21st Judicial District DA Office
State of Tennessee
421 Main St. PO Box 937 Franklin TN 37065
Official capacity

9) Kim R. Helper

21st Judicial District DA Office

421 Main St. PO Box 937 Franklin TN 37065

Individual capacity

10) Jessica N. Borne

21st Judicial District DA Office

421 Main St. PO Box 937 Franklin TN 37065

Individual capacity

Statement of Facts

My name is Athanasios Edmontson, I'm an inmate at the Williamson County Jail. I've been incarcerated since November 26th 2012. I was appointed an attorney by the court of Williamson County, Judge James G. Martin III on April 15th 2013. His name James L. Elkins, he works out of the 21st Judicial Public Defenders Office which Vanessa P. Bryan is head District Public Defender of. On August 29th 2013 my rights were violated along with The Constitution of The United States, The Constitution of The State of Tennessee, Tennessee Annotated Criminal Codes, The Rules and Laws of Criminal Procedures and malpractice when my court appointed attorney by the State of Tennessee sent information / evidence pertaining to my unresolved case that is still under investigation to another one of his clients. The 29th of August 2013 Williamson County Sheriff's Department deputy Cpl Bevins presented an inmate name Gilbert O'stringayellow 9x12 envelope. It was his motion of discovery sent by

his attorney James L. Elkins. The 9x12 envelope contain Mr. O'string discovery. Also inside of the yellow envelope was information/evidence pertaining to my unresolved case, that is still under investigation. It also had information about a guy's case named James Michael Naive inside it, whose filling an appeal after being convicted of First Degree Murder. Mr. Naive and myself information got read by serveral inmates at the Williamson County Jail. Anthony Eakes Stephen Morgan, Christopher Crouch and Nicholas Olson are some of the inmates who read it without my knowledge or permission. I have a high profile case that is still under investigation. My case along with my life was put in danger when confidential information pertaining to my case was leaked out. My case was tainted when my court appointed attorney James Elkins sent information dealing with my case to another one of his clients. His mistake was major, therefor any one could have hands on my confidential files that

can help convict me of all of my alleged charges. I fear for the safety of my case. The State of Tennessee is in charge of the 21st Judicial District DA Office and 21st Judicial District Public Defender's Office who are responsible for the parties who violated some of my rights. I've been held without a reasonable bond since April the 11th of 2013. On July 23rd of 2013 I was denied a bond reduction because I wasn't from Franklin by Judge James G. Martin III. I'm household at the Williamson County Jail were there is an mold out raged. 24th of August 2013 I was force by a deputy to eat a hair in my food or to go hungry that night because he said the hair wasn't big enough. Thank you for your time, help and cooperation.

AJL Edt

9-19-13

Key Witness

I Gilbert Deaw O'string, declare that I am the one who recieved confidential information that pertain to Mr. Athanasios Edmontson's case. On August 29th of 2013 deputy Cpl Bevins handed me my motion of discovery from my attorney James L. Elkins. The envelope contain my discovery along with information about Mr. Edmontson and James Michael Naive case inside it. I state the above mention to be factual and true under the penalty of perjury.

Gilbert O'string

9/19/13

Relief Request

- 1) State of Tennessee - 2.2 billion dollars
- 2) 21st Judicial District Circuit Court - 20 million dollars and dismissal of case
- 3) 21st Judicial Public Defender's Office - 20 million dollars
- 4) Williamson County Sheriff's Department - 15 million dollars
- 5) Judge James G. Martin III - 10 million dollars and dismissal of case
- 6) Vanessa P. Bryan - 5 million dollars
- 7) James L. Elkins - 5 million dollars
- 8) 21st Judicial District DA Office - 20 million dollars and dismissal of case
- 9) Kim R. Helper - 10 million dollars
- 10) Jessica W. Borne - 5 million dollars

305/284

INMATE REQUEST FORM

INMATE NAME: Edmontson, Athanasios

DATE: 08/24/13

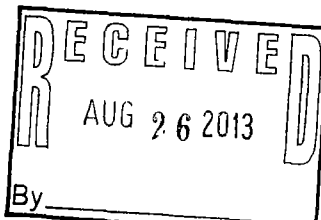
HOUSING/CELL LOCATION: _____

Has this issue been addressed by:

Floor Deputy? Yes ☒ No ☐ Who?: Cpl Bevins When? 08/24/13

Floor Corporal? Yes ☒ No ☐ Who?: Cpl Bevins When? 08/24/13

Floor Sergeant? Yes ☐ No ☐ Who?: _____ When? 1/1



REQUEST TYPE

GRIEVANCE ☒
GENERAL REQUEST ☐

Booking ☐
Circle one:
Denomination change
Item from property

Commissary ☐

Classifications ☐
Circle one:
Out Date
Job
Other

Counselor ☐
Circle one:
Bible
Rehab
Halfway House
Programs
Other

REQUEST TO (specify person): Sheriff, I addressed

Cpl Bevins about a hair being found in my food tray tonight. I showed him my untouched food tray with the hair in it and he said "its not big enough, eat around it!" I asked him would he eat around it he replied with "no, but I'm not in jail." Is this how we treat inmates here at Williamson County Sheriff's Department? I have close to 15 witnesses that saw him acknowledge my contaminated food tray with the hair in it and his remarks. Tonight I was basically forced to eat a contaminated food tray or go hungry. I'm asking you what actions/procedures should I take to resolve this issues so it won't happen again? Because its not right a inmate has to eat contaminated food because "hes or she is in jail." Thank you for your help, time and cooperation!

Ath Edms
08/24/13

RESPONSE:

This issue has been addressed and will not happen again. Feel free to inform me of anything that may happen in the future.

SIGNATURE: [Signature]

DATE: 8/26/13

Athanasios Edmondson
408 Century Court
Franklin, TN 37064



Legal Mail

RECEIVED
IN CLERK'S OFFICE
SEP 25 2013

U. S. DISTRICT COURT
MID. DIST. TENN.

Clerk, U.S. District Court
U.S. Courthouse, Room 800
Nashville, TN ~~37020~~
37203

Legal Mail

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Mail

This form is located in the
mailroom of the Department of
Justice and is used to
for the citizens.